

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

RENEE ZINSKY,)	Civil Action No.: 2:22-cv-547
)	
Plaintiff,)	
)	
v.)	Electronically Filed
)	
MICHAEL RUSSIN, RUSSIN)	
FINANCIAL, RUSSIN GROUP,)	
SIMON ARIAS, III, ARIAS AGENCIES,)	
S.A. ARIAS HOLDINGS, LLC,)	
AMERICAN INCOME LIFE)	
INSURANCE COMPANY,)	
)	
Defendants.		

MOTION TO STAY PROCEEDINGS

AND NOW, comes Defendant, Michael Russin, by and through his attorneys Benjamin D. Webb, Esquire and Cozza Law Group PLLC, and files the within Motion to Stay the Proceedings, averring as follows:

1. The parties entered into a binding settlement agreement, resolving the claims between Plaintiff and Defendants, Michael Russin, Russin Financial, and Russin Group on September 6, 2023.

2. A portion of the settlement agreement is conditioned upon the occurrence of certain events in the related AAA arbitration case. It is the undersigned counsel's understanding that the hearing in that case is scheduled for early 2024.

3. The deadline for parties to file dispositive motions in this case is November 22, 2023.

4. For the aforementioned reasons, the undersigned counsel requests that the instant proceedings be stayed for a period of 90 days during the pendency of the AAA case.

WHEREFORE, Defendant, Michael Russin, respectfully requests that this Honorable Court enter the Order attached hereto, granting Defendant's Motion to Stay the Proceedings.

Dated: October 18, 2023

Respectfully submitted

Cozza Law Group PLLC

s/Benjamin D. Webb
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Counsel for Defendant Russin

CERTIFICATE OF SERVICE

The undersigned does hereby certify that a true and correct copy of the foregoing Motion to Stay has been sent via the CM/ECF system to all counsel and/or parties of record.

Cozza Law Group PLLC

/s/Benjamin D. Webb

Benjamin D. Webb, Esquire